

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF K.S.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, K.S., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am choosing to use initials for myself and my child because I am afraid of being
5 separated from my child by the Federal Government. Out of fear and the desire to protect my
6 family, I am choosing to remain anonymous.

7 3. My child, V.S., is a non-binary transgender 18-year-old who lives with my
8 husband and me in Washington state. V.S.'s pronouns are they/them, and they were assigned
9 male at birth. V.S. is currently a senior in high school and is applying to universities to pursue a
10 degree in engineering after recently coming in 3rd place at a national engineering competition.

11 4. V.S. is a deep-thinker and considers every decision very carefully over a long
12 period of time. COVID hit when V.S. was 13 years old. They struggled with not being able to
13 see other people, especially as a single child. But during that time, they had time to think about
14 who they were and realized they are non-binary.

15 5. V.S. began to show signs of depression in early 2021 when they were 14 years
16 old. V.S. was able to go back to school in-person, but they didn't want to do things they used to
17 love, like playing baseball, and started pulling away from their friends. V.S. started counseling,
18 but things did not seem to improve much. When we talked about it, V.S. told us they wanted to
19 change their name, use they/them pronouns, and begin dressing differently. One time when we
20 were on a day trip, V.S. saw a long dress in a store window and kept staring at it. We went into
21 the store so V.S. could try it on. They were absolutely beaming when they came out of the
22 dressing room wearing the dress. It was very clear to me that in that moment, V.S. felt like their
23 authentic self, and that is so important to me as a parent.

24 6. In the summer of 2022, my husband and I noticed that V.S. had started showering
25 with the lights off. We realized this was a sign of gender dysphoria and that V.S. did not want to
26 see their naked body. We knew we had to do something. We asked V.S. how they felt about their

1 body and to let us know what we can do to help. After a bit of time, V.S. came to us and said
 2 they wanted to start hormone replacement therapy. My husband and I said we would schedule
 3 time for them to talk to their doctor and follow the medical process.

4 7. V.S. saw their doctor, who confirmed our suspicion that V.S. was experiencing
 5 symptoms of gender dysphoria. V.S.'s doctor connected us with a program at a hospital here in
 6 Seattle and V.S. began receiving gender-affirming care. In October 2022, V.S. started hormone
 7 therapy at 16 years old. Every step of the way, our medical providers offered us resources like
 8 counseling and guidance, making sure V.S. and our family were sure this was the right treatment
 9 for V.S.

10 8. As I mentioned, V.S. is a deep thinker. They wanted to be as cautious as possible
 11 starting hormone therapy. They knew that Estradiol would lower their testosterone, raise their
 12 estrogen, that this would affect the shape of their body, and if they should choose to want to have
 13 child in the future, they may be sterile and unable to do so. V.S. knew that some changes would
 14 be permanent, but also that they could stop the medication any time they wanted to and most of
 15 those changes would go away. They took the hormone dosages slowly, starting from a small
 16 amount and increasing as they became comfortable. V.S. chose to start with hormones and see
 17 how that went before considering surgeries or other steps.

18 9. Maybe six months after starting hormone therapy, V.S. returned to showering
 19 with the lights on. They started getting more involved at school again, spending time with people,
 20 and doing activities. They got involved in their Technology Student Association and went on to
 21 win 3rd place in a national competition. V.S. no longer needed one-on-one counseling. Our entire
 22 family and all our friends saw the same difference in them that my husband and I saw. They
 23 were so much happier, which is what any parent wants for their child.

24 10. I know and believe my child is who they say they are. V.S. has deeply considered
 25 each and every step of their transition. I know that they are not being influenced by their friends
 26 because none of them are going through the same thing. I know that the gender-affirming care

1 V.S. has received, particularly hormone replacement therapy, has helped my child to feel more
2 comfortable in their body and like their true, authentic self.

3 11. This week, I learned about an Executive Order (EO) issued by President Trump
4 that would essentially ban gender-affirming care for anyone under the age of 19 and criminalize
5 parents and providers who try to help them get it. This has already had a huge impact on V.S.,
6 as well as my husband and me. We all worry about whether V.S. will be able to access the care
7 they need, and that they will be safe in the United States. For example, V.S. is only applying to
8 colleges in states where they will be able to continue to receive hormone replacement therapy,
9 and where it is safe for them to present as a non-binary trans person.

10 12. The EO has made me extremely hesitant to support V.S. moving far away from
11 me, where I can't get to them quickly if they need me. We discuss these things as a family and
12 try to have boundaries to protect our mental health, but it is weighing so heavily on all of us.
13 Since the Executive Order issued, V.S.'s energy has significantly decreased. They are under a
14 lot of pressure already with homework and clubs and writing college essays, and now they are
15 also worrying about their safety and ability to keep being their authentic self. Their father and I
16 are also worried about how we protect our child and ensure they get the care they need.

17 13. Gender-affirming care has had a *huge, positive* impact on my child. They have
18 been on hormones for over two years and have made such a wonderful difference in my child's
19 life. I asked V.S. if they wanted to be a part of this process and they immediately said yes. My
20 husband and I can't afford to file this lawsuit on our own, but this issue is too important to not
21 get involved. This Executive Order is about somebody's life. A lot of people's lives. And my
22 own child's life because I don't know that they would be here today if they hadn't been able to
23 get gender-affirming care, and their father and I are very worried about what would happen if
24 they couldn't get their medicine anymore.

1 14. We are all very worried and scared of what this Executive Order may do and how
2 it will affect V.S. and our family. All we want is for our child to be happy and safe. They need
3 their hormone therapy, and they need to be free to be who they truly are.

4 I declare under penalty of perjury under the laws of the State of Washington and the
5 United States of America that the foregoing is true and correct.

6 DATED this ____ day of February 2025 at _____, Washington.

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9 K.S.
10 Parent of V.S.
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1 14. We are all very worried and scared of what this Executive Order may do and how
2 it will affect V.S. and our family. All we want is for our child to be happy and safe. They need
3 their hormone therapy, and they need to be free to be who they truly are.

4 I declare under penalty of perjury under the laws of the State of Washington and the
5 United States of America that the foregoing is true and correct.

6 DATED this 2nd day of February 2025 at Shoreline, Washington.

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K.S.

9 Parent of V.S.
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